

## Office of Engineering and Technology

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### **Inquiry on 04/15/2016 :**

#### **Inquiry:**

The Applicant performed Low Duty Factor Analysis to get SAR test exclusion for his composite device to be used in portable configuration (worn on an ankle).

The device contains 2 single radio modules: Cellular module, 289 mW, FCC ID: R5Q-LISAC200A and Wi-Fi module 80 mW, FCC ID: QOQWF121.

The first module is already has a Class 2 PC which qualify it to use in portable configuration. The second (Wi-Fi) module is certified to be used only as mobile module.

The Applicant is requested to perform Class 2 PC for FCC ID: QOQWF121 to change this module from mobile to portable, considering a low Duty Factor in normal operation.

The Applicant is also has submitted the Inquire (Tracking Number 749941) asking a question: "Does the manufacturer of the original cellular module, for which a SAR exclusion was obtained, have to re-apply for a new CIIPC that includes the new WiFi transmitter (along with the cell module)?"

He received the following answer:

"Please be advised that only one of the multiple modules within the overall EUT would require the updated modification to demonstrate and reflect that the entirety of the system was compliant under the revised configuration."

In current Inquire we are asking to review the Low Duty Factor Analysis for simultaneous transmission of both radio modules and get permission to perform Class 2 PC for the second module (Wi-Fi, FCC ID: QOQWF121) to qualify it for SAR Test exclusion.

The files "RF exposure DF Analysis" and "Antenna spacing" are attached.

---Reply from Customer on 04/28/2016---

Is submitted on March 15, 2016 this Inquire according to the Pre-approval procedure per KDB

388624 DO2 sec. C.1.n -Low DF analysis to qualify for SAR testexclusion.

I also fill out the 731 Form for FCC ID: QOQWF121 without accepting the Grant.

I have notreceived an approval. Could you please advise if there are any questionsor concerns to be addressed, and when I mayexpect the Response?

Thank youvery much for your time and I look forward to hearing from you.

Best regards,

David Chernomordik, Intertek TCB

**FCC response on 05/04/2016**

The TCB may proceed with the application for this device as the low duty factor analysis is approved. The C2PC for the second module may also proceed.

**Attachment Details:**

[RF exposure DF analysis](#)

[Antenna spacing distance....](#)